

	1500 South Utica Avenue, Suite 400 Tulsa, Oklahoma 74104-6522	Additional expected testimony provided in Troop Z interview summaries
3.	Megan Simpson c/o Drummond Law, PLLC 1500 South Utica Avenue, Suite 400 Tulsa, Oklahoma 74104-6522	Deposed, defendant in case. All matters concerning complaints and answers. Additional expected testimony provided in Troop Z interview summaries.
4.	Michael Harrell c/o Drummond Law, PLLC 1500 South Utica Avenue, Suite 400 Tulsa, Oklahoma 74104-6522	Deposed, defendant in case. All matters concerning complaints and answers. Additional expected testimony provided in Troop Z interview summaries .
5.	Troy German c/o Barrett T. Bowers, Barrett T. Bowers, PLLC P.O. Box 891628 Oklahoma City, Oklahoma 73189	Plaintiff in case. All matters concerning complaints and answers. Additional expected testimony provided in Troop Z interview summaries.
6.	Major Jason Holt c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fyllaw.com	Case agent. All matters concerning the Troop Z investigation of Plaintiff, including content of interviews of parties and witnesses during the investigation and findings and conclusions reached during the investigation.
7.	Trooper Jim Parrish c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033	Co-case agent. All matters concerning the Troop Z investigation of Plaintiff, including content of interviews of parties and witnesses during the investigation

	Facsimile: 405-632-3036 andrewc@fylaw.com	and findings and conclusions reached during the investigation.
8.	Lieutenant Robert Francis c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170	He will testify regarding interview of witnesses in Troop Z investigation, including Plaintiff. He will also testify regarding search warrant of residence in McIntosh County, OK
9.	Trooper Paul Christian c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170	He will testify regarding the investigation into Plaintiff providing test questions to Defendant Brian Orr.
10.	Assistant Attorney General, Dane Towery Oklahoma Attorney General Office 313 N.E. 21st Street Oklahoma City, OK 73105	He will testify regarding matters related to prosecution of Plaintiff, including a settlement agreement whereby charges against Plaintiff were dismissed in exchange for Plaintiff's agreement to resign his employment with the State
	The following witnesses may be called if the need arises:	
11.	Lieutenant Johnny Fairres c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com	He will testify regarding interview of witnesses in Troop Z investigation, including Plaintiff. He will also testify regarding search warrant of residence in McIntosh County, OK
12.	Lieutenant Robert Francis c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036	He may testify regarding interviews and investigative work for Troop Z investigation of Plaintiff, including forensic downloads of cell phones and digital media storage devices during the Troop Z investigation

	andrewc@fylaw.com	
13	<p>Intelligence Analyst Trista Wynn Gregory</p> <p>c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com</p>	She may testify regarding investigative work for Troop Z investigation of Plaintiff, including analysis of cell phone records
14	<p>Trooper Matt Gottschalk</p> <p>c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com</p>	He may testify regarding interviews and investigative work for Troop Z investigation of Plaintiff, including forensic downloads of cellular telephones and digital media storage devices
15	<p>Trooper Cliff Kinsler</p> <p>c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com</p>	He may testify regarding investigative work for Troop Z investigation of Plaintiff .
16	<p>Trooper Anthony Linares</p> <p>c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com</p>	He may testify regarding investigative work for Troop Z investigation of Plaintiff

17	<p>Trooper Kevin Logan</p> <p>c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com</p>	<p>He may testify regarding investigative work for Troop Z investigation of Plaintiff</p>
18	<p>Trooper Aaron McKey</p> <p>c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com</p>	<p>He may testify regarding investigative work for Troop Z investigation of Plaintiff</p>
19	<p>Trooper David Medlin</p> <p>c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com</p>	<p>He may testify regarding investigative work for Troop Z investigation of Plaintiff</p>
20	<p>Trooper Scott Miller</p> <p>c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com</p>	<p>He may testify regarding investigative work for Troop Z investigation of Plaintiff</p>
21	Trooper Michael Orr	

	c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com	He may testify regarding investigative work for Troop Z investigation of Plaintiff
22	Trooper Bobby Raines c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com	He may testify regarding interviews and investigative work for Troop Z investigation of Plaintiff
23	Trooper Destry Richardson c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com	She may testify regarding interviews and investigative work for Troop Z investigation of Plaintiff
24	Trooper Trayce Ross c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com	He may testify regarding interviews and investigative work for Troop Z investigation of Plaintiff
25	Trooper Stephen Spencer c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170	He may testify regarding interviews and investigative work for Troop Z investigation of Plaintiff

	Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com	
26	Trooper Matt Sullivan c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com	He may testify regarding interviews and investigative work for Troop Z investigation of Plaintiff
27	Trooper Michael Wallace c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com	He may testify regarding interviews and investigative work for Troop Z investigation of Plaintiff
28	Trooper Eddie Weiler c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com	He may testify regarding interviews and investigative work for Troop Z investigation of Plaintiff
29	Darren Gordon OK County DA's office 320 Robert S Kerr OKC OK 73102	He may testify regarding investigative work for Troop Z investigation of Plaintiff, including forensic downloads of digital media storage devices
30	Master Sergeant Steve Chandler University of Oklahoma Police Dept 2775 S. Monitor Ave	He may testify regarding interviews and investigative work for Troop Z investigation of Plaintiff .

	Norman, OK 73072	
31	Analyst Anthony Meter c/o Homeland Security investigations Computer forensics 300 north Denver ave Tulsa ok 74103	He may testify regarding interviews and investigative work for Troop Z investigation of Plaintiff
32	Detective Eric Leverington Tulsa PD 600 Civic Center Tulsa, OK 74103	He may testify regarding interviews and investigative work for Troop Z investigation of Plaintiff
33	Major Todd Blish c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com	He may testify consistent with his interview summary provided in the Troop Z investigation
34	Assistant Chief Gary Boggess Interview c/o Address and contact information in Troop Z investigation.	He may testify consistent with his interview summary provided in the Troop Z investigation
35	Lt. Eddie Bohanon c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com	He may testify consistent with his interview summary provided in the Troop Z investigation
36	Cliff Craig	

	Address and contact information in Troop Z investigation.	He may testify consistent with his interview summary provided in the Troop Z investigation
37	Gerald Davidson c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com	He may testify consistent with his interview summary provided in the Troop Z investigation
38	Chief Ray Driskell Address and contact information in troop z investigation	He may testify consistent with his interview summary provided in the Troop Z investigation
39	Kim Evans Address and contact information in troop z investigation	He may testify consistent with his interview summary provided in the Troop Z investigation
40	Rodney Faulkenberry c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com	He may testify consistent with his interview summary provided in the Troop Z investigation
41	Lt. Mike Fike c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com	He may testify consistent with his interview summary provided in the Troop Z investigation

42	<p>Special Agent Stan Florence c/o Oklahoma State Bureau of Investigation (“OSBI”) 6600 N. Harvey Pl. Oklahoma City, OK 73116</p>	<p>He may testify consistent with his interview summary provided in the Troop Z investigation</p>
43	<p>Lieutenant Derek Griffey c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com</p>	<p>He may testify consistent with his interview summary provided in the Troop Z investigation</p>
44	<p>Brandon Johnson c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com</p>	<p>He may testify consistent with his interview summary provided in the Troop Z investigation</p>
45	<p>Tanara Lang c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com</p>	<p>He may testify consistent with his interview summary provided in the Troop Z investigation</p>
46	<p>Matthew Lay c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033</p>	<p>He may testify consistent with his interview summary provided in the Troop Z investigation</p>

	Facsimile: 405-632-3036 andrewc@fylaw.com	
47	Lt. Col. Russell Maples c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com	He may testify consistent with his interview summary provided in the Troop Z investigation
48	Major Pat Mays c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com	He may testify consistent with his interview summary provided in the Troop Z investigation
49	Major Mike McClelland c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com	He may testify consistent with his interview summary provided in the Troop Z investigation
50	Major Mike Mize c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com	He may testify consistent with his interview summary provided in the Troop Z investigation

51	<p>Trooper Ken Pittman</p> <p>c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com</p>	<p>He may testify consistent with his interview summary provided in the Troop Z investigation</p>
52	<p>Mike Sanders</p> <p>c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com</p>	<p>He may testify consistent with his interview summary provided in the Troop Z investigation</p>
53	<p>Lt. Ron Shatsar</p> <p>c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com</p>	<p>He may testify consistent with his interview summary provided in the Troop Z investigation</p>
54	<p>Trooper Mike Smith</p> <p>c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com</p>	<p>He may testify consistent with his interview summary provided in the Troop Z investigation</p>

55	<p>Major Brent Sugg</p> <p>c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com</p>	<p>He may testify consistent with his interview summary provided in the Troop Z investigation</p>
56	<p>Captain Tim Tipton</p> <p>c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com</p>	<p>He may testify consistent with his interview summary provided in the Troop Z investigation</p>
57	<p>Major Garrett Vowell</p> <p>c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com</p>	<p>He may testify consistent with his interview summary provided in the Troop Z investigation</p>
58	<p>Captain Joe Williams</p> <p>c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com</p>	<p>He may testify consistent with his interview summary provided in the Troop Z investigation</p>
59	<p>Lt. Colonel JD Wilson</p> <p>c/o Dept. of Public Safety</p>	

	c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com	He may testify consistent with his interview summary provided in the Troop Z investigation
60	Lt. Dawson Blacklee c/o Dept. of Public Safety c/o Foshee & Yaffe 12231 S. May Ave Oklahoma City, OK 73170 Telephone: 405-378-3033 Facsimile: 405-632-3036 andrewc@fylaw.com	He may testify regarding the investigation into Plaintiff providing test questions to Lt. Blacklee in violation of trooper code of ethics.
61	All witnesses listed by Plaintiff and other defendants, not otherwise objected to by Defendant	Facts and circumstances relevant to allegations contained in the Complaint.
62	Rebuttal witnesses	
63	Authentication witnesses	
64	Records custodians	
65	This list will be supplemented during discovery or as otherwise required by the Federal Rules of Civil Procedure or the Court's Scheduling Order. Discovery is ongoing	

Respectfully Submitted,

/s/Andrew M. Casey

S. ALEX YAFFE, OBA No. 21063

ANDREW M. CASEY, OBA# 32371

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Oklahoma City, OK 73170

Telephone: 405-378-3033

Facsimile: 405-632-3036

CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2020, I filed the above document with the Clerk of Court. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the Electronic Case Filing System.

s/ Andrew M. Casey